

Harpreet S. Walia, Esq. (SBN 176136)
Lisa M. Chapman, Esq. (SBN 118113)
ROYSE LAW FIRM, PC
1717 Embarcadero Road
Palo Alto, California 94303
Telephone: (650) 813-9700
Facsimile: (650) 813-9777
E-Mail: hwalia@rroyleslaw.com
lchapman@rroyleslaw.com

Atorneys for Counterdefendant SANDEEP SOOD and
MONSOON ENTERPRISES, INC., a California corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NEXTDOOR.COM, INC., a Delaware corporation,

Plaintiff,

v.

RAJ ABHYANKER, an individual,
Defendant.

Defendant.

RAJ ABHYANKER, an individual,

Counterclaimant,

V.

NEXTDOOR.COM, INC., a Delaware corporation; PRAKASH JANAKIRAMAN, an individual; BENCHMARK CAPITAL PARTNERS VII, L.P., a Delaware limited partnership; BENCHMARK CAPITAL MANAGEMENT CO. VII LLC, a Delaware limited liability company; SANDEEP SOOD, an individual; MONSOON COMPANY, an unknown business entity, and DOES 1-50, inclusive.

Counterdefendants.

Case No.: 3:12-cv-05667-EMC

**DECLARATION OF HARPREET S.
WALIA IN SUPPORT OF
COUNTERDEFENDANTS SANDEEP
SOOD AND MONSOON ENTERPRISES,
INC'S REQUEST FOR JUDICIAL
NOTICE**

Complaint Filed: November 5, 2012
Countercomplaint Filed: January 10, 2013

Date: May 2, 2013
Time: 1:30 PM
Judge: Honorable Edward M. Chen

1 I, HARPREET S. WALIA, do hereby declare as follows:

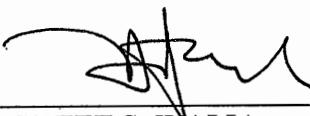
2 1. I am an attorney at law and a member of the Royse Law Firm, PC, which represents
 3 Counterdefendants Sandeep Sood (“Sood”) and Monsoon Enterprises, Inc., a California corporation
 4 (erroneously sued herein as Monsoon Company, an unknown business entity) (“Monsoon”)
 5 (collectively “Counterdefendants”) before the Court in this action. I am licensed to practice law in the
 6 State of California and admitted before this Court. I have personal knowledge of each of the facts set
 7 forth herein, and would competently testify to the truth thereof if called as a witness.

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of Counterclaimant Raj
 9 Abhyanker’s Complaint for Damages and Equitable Relief for Intentional Interference with Existing
 10 and Prospective Economic Advantage, Breach of Confidence, Breach of Contract, Fraud and
 11 Conspiracy to Defraud, Constructive Fraud and Aiding and Abetting Constructive Fraud, Unjust
 12 Enrichment, Unfair Business Acts and Practices in Violation of Business and Professions Code
 13 (Cal.Civ.Code § 17200 et seq.), Violations of the California Corporate Securities Laws, and
 14 Misappropriation of Trade Secrets (Cal.Civ.Code § 3426, et seq.), filed on November 10, 2011 in the
 15 Superior Court of California, County of Santa Clara, as Civil Case No. 1-10-CV-212924.

16 3. Attached as **Exhibit 2** is a true and correct copy of Counterclaimant Raj Abhyanker’s
 17 First Amended Complaint for and Misappropriation of Trade Secrets (Cal.Civ.Code § 3426, et seq.),
 18 Fraud and Conspiracy to Defraud, Constructive Fraud and Aiding and Abetting Constructive Fraud,
 19 Negligent Interference with Existing and Prospective Economic Advantage, Breach of Confidence,
 20 Breach of Contract, Breach of Implied Covenant of Good Faith and Fair Dealing, Negligent
 21 Misrepresentation, Tortious Interference with Contract, Unjust Enrichment, Unfair Business Acts and
 22 Practices in Violation of Business and Professions Code (Cal.Civ.Code § 17200 et seq.), Violations of
 23 the California Corporate Securities Laws, and Conversion, filed on December 6, 2011 in the Superior
 24 Court of California, County of Santa Clara, as Civil Case No. 1-11-CV-212924.

25 4. Attached as **Exhibit 3** is a true and correct copy of Counterclaimant Raj Abhyanker’s
 26 November 22, 2006 patent application no. 11/603,442; Publication Date September 20, 2007 entitled
 27 “Map Based Neighborhood Search and Community Contribution.”

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct and that this Declaration is executed this 15th day of March, 2013 at Palo Alto,
3 California.

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7 HARPREET S. WALIA

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